

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION**

K.A., a minor, by and through her next
friend and guardian, Lisa Adams, *et al.*,
individually and as representatives
of a proposed class,

Plaintiffs,

v.

JEFF HOBBY, Sheriff of Worth
County, Georgia, in his individual
capacity, *et al.*,

Defendants.

CIVIL ACTION NO.:
1:17-cv-00099-LJA

**JOINT MOTION FOR CONDITIONAL CERTIFICATION OF
SETTLEMENT CLASS**

Plaintiffs K.A., T.S., B.S., A.W., D.J., L.H., and J.E., by and through their next friends and guardians, and S.M. and K.P. (collectively, “Plaintiffs”) and Defendants Jeff Hobby, David Carmichael, Chris Baltenberger, John Brannen, Wesley Chambless, Anthony Cravey, Skyler Duke, Kevin Ford, Lisa House, Paul Klein, Clay Lawson, Truitt Odom, Richard Sanders, Lisa Stocks, John Sumner, Tyler Turner, Brandi Whiddon, and Deidra Tucker Whiddon (collectively, “Defendants”), hereinafter collectively referred to as the “Parties,” jointly move

the Court under Rule 23 of the Federal Rules of Civil Procedure to certify a class for settlement purposes; appoint class counsel; preliminarily approve a proposed settlement; direct that notice shall be issued to the class members; and schedule a final fairness hearing. *See Ault v. Walt Disney World Co.*, 692 F.3d 1212, 1217 (11th Cir. 2012). The parties seek to certify a class consisting of “all students seized and searched by employees of the Worth County Sheriff at Worth County High School on April 14, 2017, other than those identified on Sheriff Hobby’s target list.”¹

As explained in the attached memorandum of law, this case satisfies the prerequisites for class certification, and the parties’ proposed settlement agreement fairly and adequately resolves the claims of the proposed class members.

CONCLUSION

The Court should preliminarily approve the proposed settlement and certify a settlement class consisting of “all students seized and searched by employees of

¹ Defendant Hobby had a list of thirteen students on a “target list” that he suspected of possessing drugs. (Doc. 10 ¶¶ 9, 56.) The target list included only three students who were in school on April 14, 2017. (Doc. 10 ¶¶ 9, 56-58.) As alleged in the Amended Complaint (Doc. 10 ¶¶ 9, 56-58), the three students on the Sheriff’s target list in attendance that day were detained and searched in administrative offices at the school, rather than in the hallways or gym with the rest of their classmates.

the Worth County Sheriff at Worth County High School on April 14, 2017, other than those identified on Sheriff Hobby's target list."

Respectfully submitted this 4th day of December, 2017.

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